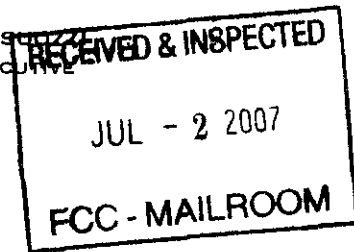


THOMAS R. SCOTT
COUNTY EXECUTIVE



THOMAS E. TILLEY
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June 25, 2007

Ms. Marlene H. Dortch
Secretary to the
Federal Communications Commission
Washington, D.C. 20554

Re: Petition for Reconsideration of the City of New York
WT Docket No. 99-87

Dear Ms. Dortch:

On behalf of Nassau County Fire & Rescue Services, this letter addresses the Petition for Reconsideration of the City of New York relating to the Commission's intention to mandate a transition to 6.25 kHz spectrum efficiency technology, as soon as it determines that sufficient equipment is available. It encourages agencies to transition to 6.25 kHz technologies immediately instead of pursuing 12.5 kHz technology. We agree with New York City's position. The Commission should rescind its decision and reexamine the extreme challenges public safety communications faces and how its decision will impose even greater burdens.

The Commission's decision undermines public safety wireless communications and will disrupt operations. Enormous investment is being directed to 12.5 kHz technologies. The Commission's intention to force agencies to abandon this investment in favor of 6.25 kHz technologies is essentially a federal mandate unaccompanied by any acknowledgement of the resources necessary to comply. The decision ignores the reality that there is no tested base of 6.25 kHz equipment meeting public safety standards. The Commission's action fails to address how state and local governments will pay the costs associated with mandated 6.25 kHz infrastructure and subscriber equipment, on the heels of recent investments in 12.5 kHz equipment. It ignores the extended life cycles of public safety equipment driven by limited funding.

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Any decision mandating 6.25 kHz technologies must be preceded by an analysis of how public safety agencies can make a reasoned migration to such an environment. There remain enormous technical challenges in moving to 6.25 kHz. The first is the need to develop dual mode/backward compatibility equipment so that new equipment can communicate with legacy equipment. The greater challenge is that, as the narrower bandwidth encompasses realigning channel allocations and spacing, unless the new environment is analyzed with precision, various agencies whose communications currently coexist will interfere with each other. A more complex and broader frequency coordination process is needed. Instead of stating that it will expeditiously mandate 6.25 kHz technology, the Commission should afford agencies the opportunity to analyze how a migration addressing these challenges can be structured.

Unless reconsidered, the Commission's decision will cause immeasurable harm to public safety communications. It will strand investment of state and local governments in communications networks. More critically, by affording no opportunity to plan and implement a reasoned migration path consistent with public safety standards, it creates unacceptable risks to emergency response. We urge the Commission to rescind its decision and commence an examination of the ramifications and challenges that 6.25 kHz presents to public safety and all land mobile communications.

Very truly yours,

A handwritten signature in dark ink, appearing to read "Peter W. Meade", written in a cursive style.

Peter W. Meade

Assistant Chief Fire Marshal for Fire & Rescue Services

Chairman, Region 8 700MHz and 800MHz FCC Public Safety Radio Committees